

EXHIBIT B

DOCUMENT 3



AlaFile E-Notice

49-CV-2021-900080.00

To: HENRY AND HENRY
207 STURGIS RD
MARION, KY, 42064

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA

TERRY LYNN LIGON V. BURRELL FITCH ADRIANCE ET AL
49-CV-2021-900080.00

The following complaint was FILED on 10/7/2021 4:10:41 PM

Notice Date: 10/7/2021 4:10:41 PM

DENISE MIXON
CIRCUIT COURT CLERK
MARION COUNTY, ALABAMA
132 SOUTH MILITARY STREET
HAMILTON, AL, 35570

205-921-7451
denise.mixon@alacourt.gov

DOCUMENT 4

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 49-CV-2021-900080.00
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IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA
TERRY LYNN LIGON V. BURRELL FITCH ADRIANCE ET AL

NOTICE TO: HENRY AND HENRY, 207 STURGIS RD, MARION, KY 42064

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).
 THOMAS W HARMON

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: P. O. BOX 67, ANNISTON, AL 36202

[Address(es) of Plaintiff(s) or Attorney(s)]

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of TERRY LYNN LIGON
 pursuant to the Alabama Rules of the Civil Procedure. *[Name(s)]*

10/07/2021 /s/ DENISE MIXON By: _____
 (Date) *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ THOMAS W HARMON
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)

DOCUMENT 1



ELECTRONICALLY FILED

10/7/2021 4:10 PM

49-CV-2021-900080.00

CIRCUIT COURT OF

MARION COUNTY, ALABAMA
DENISE MIXON, CLERKCase
49Date of Filing:
10/07/2021

Judge Code:

State of Alabama
Unified Judicial System
Form AR Civ-93 Rev. 9/18**COVER SHEET**
CIRCUIT COURT - CIVIL CASE
(Not For Domestic Relations Cases)**GENERAL INFORMATION****IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA**
TERRY LYNN LIGON v. BURRELL FITCH ADRIANCE ET ALFirst Plaintiff: ☐ Business ☒ Individual
☐ Government ☐ OtherFirst Defendant: ☐ Business ☒ Individual
☐ Government ☐ Other**NATURE OF SUIT:** Select primary cause of action, by checking box (check only one) that best characterizes your action:**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death
☐ TONG - Negligence: General
☒ TOMV - Negligence: Motor Vehicle
☐ TOWA - Wantonness
☐ TOPL - Product Liability/AEMLD
☐ TOMM - Malpractice-Medical
☐ TOLM - Malpractice-Legal
☐ TOOM - Malpractice-Other
☐ TBFM - Fraud/Bad Faith/Misrepresentation
☐ TOXX - Other: _____

TORTS: PERSONAL INJURY

- ☐ TOPE - Personal Property
☐ TORE - Real Property

OTHER CIVIL FILINGS

- ☐ ABAN - Abandoned Automobile
☐ ACCT - Account & Nonmortgage
☐ APAA - Administrative Agency Appeal
☐ ADPA - Administrative Procedure Act
☐ ANPS - Adults in Need of Protective Service

OTHER CIVIL FILINGS (cont'd)

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/
Enforcement of Agency Subpoena/Petition to Preserve
☐ CVRT - Civil Rights
☐ COND - Condemnation/Eminent Domain/Right-of-Way
☐ CTMP - Contempt of Court
☐ CONT - Contract/Ejectment/Writ of Seizure
☐ TOCN - Conversion
☐ EQND - Equity Non-Damages Actions/Declaratory Judgment/
Injunction Election Contest/Quiet Title/Sale For Division
☐ CVUD - Eviction Appeal/Unlawful Detainer
☐ FORJ - Foreign Judgment
☐ FORF - Fruits of Crime Forfeiture
☐ MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition
☐ PFAB - Protection From Abuse
☐ EPFA - Elder Protection From Abuse
☐ QTLB - Quiet Title Land Bank
☐ FELA - Railroad/Seaman (FELA)
☐ RPRO - Real Property
☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship
☐ COMP - Workers' Compensation
☐ CVXX - Miscellaneous Circuit Civil Case

ORIGIN: F ☒ INITIAL FILINGA ☐ APPEAL FROM
DISTRICT COURTO ☐ OTHERR ☐ REMANDEDT ☐ TRANSFERRED FROM
OTHER CIRCUIT COURTHAS JURY TRIAL BEEN DEMANDED? ☒ YES ☐ NONote: Checking "Yes" does not constitute a demand for a
jury trial. (See Rules 38 and 39, Ala.R.Civ.P., for procedure)RELIEF REQUESTED: ☒ MONETARY AWARD REQUESTED ☐ NO MONETARY AWARD REQUESTED

ATTORNEY CODE:

HAR088

10/7/2021 4:10:39 PM

Date

/s/ THOMAS W HARMON

Signature of Attorney/Party filing this form

MEDIATION REQUESTED: ☐ YES ☒ NO ☐ UNDECIDEDElection to Proceed under the Alabama Rules for Expedited Civil Actions: ☐ YES ☐ NO

DOCUMENT 2



ELECTRONICALLY FILED
10/7/2021 4:10 PM
49-CV-2021-900080.00
CIRCUIT COURT OF
MARION COUNTY, ALABAMA
DENISE MIXON, CLERK

IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA

TERRY LYNN LIGON,

Plaintiff

v.

CASE NO.: CV-2021-

BURRELL FITCH ADRIANCE;
HENRY AND HENRY, INC.; Fictitious
Defendants "A" through "C" intended thereby
to designate those persons and/or entities who
negligently and/or wantonly operated a motor
vehicle that collided with Plaintiff's motor
vehicle on June 1, 2021; Fictitious Defendants
"D" through "F" intended thereby to designate
those persons and/or entities who negligently
and/or wantonly entrusted a motor vehicle to
Defendant Burrell Fitch Adriance, and/or
Defendants "A" through "C" and thereby
contributed and/or caused the damages
described in this Complaint, Fictitious
Defendants "G" through "I" intended thereby
to designate those persons and/or entities whose
negligent and/or wanton conduct caused and/or
contributed to the losses and damages described
in this Complaint, and Fictitious Defendants
"J" through "L" intended thereby to designate
those persons or entities who employed Burrell
Fitch Adriance, and/or Fictitious Defendants
"A", "B", and "C" at the time of the accident
described herein and whose negligence and/or
wanton conduct caused and/or contributed to
the damages described in this Complaint, all of
whose names are unknown but will be added by
amendment when ascertained.

Defendants.

COMPLAINT

COMES NOW the Plaintiff, TERRY LYNN LIGON, and respectfully represents and shows
unto the Court as follows:

DOCUMENT 2

PARTIES

1. Plaintiff, TERRY LYNN LIGON, is over the age of nineteen years and is a resident of Cleburne County, Alabama.

2. Defendant, BURRELL FITCH ADRIANCE, is over the age of nineteen (19) years and resident of Elberton, Georgia.

COUNT ONE

3. On or about June 1, 2021, upon a public highway known as Interstate 22, at or near the intersection with CR-13, Marion County, Alabama, the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C" negligently or wantonly operated a motor vehicle causing said motor vehicle to collide with the vehicle being driven by Plaintiff, TERRY LYNN LIGON.

4. As a direct result and proximate consequence of Defendant driver's said negligence or wantonness, the Plaintiff, TERRY LYNN LIGON, was caused to suffer the following damages:

- A. He was bruised and contused over his entire body;
- B. He was caused to suffer a serious injury to his right knee;
- C. He was caused to incur hospital, doctor, drug, and medical bills in and about the treatment of his injuries and will in the future suffer expenses for medical treatment;
- D. He was caused to lose income;
- E. He suffered permanent impairment;
- F. He was caused to suffer great physical pain and mental anguish and will suffer extreme pain and mental anguish in the future.

WHEREFORE, Plaintiff, TERRY LYNN LIGON, demands judgment against the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C" for

DOCUMENT 2

compensatory as well as punitive and exemplary damages in the amount to be determined by the trier of fact, plus interest and costs of court.

COUNT TWO

5. The Plaintiff re-alleges and incorporates by reference the allegations of Count One above as if set out herein verbatim.

6. On or about the 1st day of June, 2021, the Defendant Henry and Henry, Inc. and Fictitious Defendants "D" through "F" negligently and/or wantonly entrusted a motor vehicle to the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C". Following said entrustment, the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C", negligently and/or wantonly allowed said motor vehicle to collide with the vehicle that the Plaintiff, TERRY LYNN LIGON, was driving.

7. As a proximate result of Fictitious Defendants "D" through "F" said negligence and/or wantonness, the Plaintiff, TERRY LYNN LIGON, was caused to suffer physical injuries. The Plaintiff, TERRY LYNN LIGON, was caused to incur hospital and medical expenses, physical pain and suffering, permanent impairment, and lost income, along with other damages. The Plaintiff, TERRY LYNN LIGON, will continue to suffer said damages in the future.

WHEREFORE, premises considered, the Plaintiff, TERRY LYNN LIGON, claims compensatory and punitive damages for damages to both person and property and hereby demands judgment against all defendants both real and fictitious in an amount to be determined by the trier-of-fact plus interest and costs.

COUNT THREE

8. The Plaintiff re-alleges and incorporates by reference paragraphs one through seven as if set out herein verbatim.

DOCUMENT 2

9. Fictitious Defendants "J" through "L" was or were the employers of the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C", as of the date of the accident. The Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C", were acting within the line and scope of his employment with Fictitious Defendants "J" through "L" at the time of the acts complained of herein. Fictitious Defendants "J" through "L" were negligent and/or wanton in their hiring, training, supervision, retention and/or entrustment of a motor vehicle to the Defendant, BURRELL FITCH ADRIANCE, and/or Fictitious Defendants "A" through "C".

10. As a proximate result of said negligence and/or wantonness of Fictitious Defendants "J" through "L", the Plaintiff, TERRY LYNN LIGON, was caused to suffer physical injury. The Plaintiff, TERRY LYNN LIGON, was caused to incur hospital and medical expenses, suffer physical pain and suffering and lost income, along with other damages. The Plaintiff, TERRY LYNN LIGON, will continue to suffer said damages in the future.

WHEREFORE, premises considered, the Plaintiff, TERRY LYNN LIGON, claims compensatory and punitive damages and hereby demands judgment against all defendants both real and fictitious in an amount to be determined by the trier-of-fact plus interest and costs.

COUNT FOUR

11. The Plaintiff re-alleges and incorporates by reference paragraphs one through fifteen as if set out herein verbatim.

12. On or about June 1, 2021, upon a public highway known as Interstate 22 at or near the intersection with CR-13, Marion County, Alabama, the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C", negligently or wantonly operated a motor vehicle as to cause it to collide with the vehicle being driven by Plaintiff, TERRY LYNN LIGON.

DOCUMENT 2

13. As a proximate consequence of the negligence or wantonness of the Defendant, BURRELL FITCH ADRIANCE, and/or fictitious Defendants "A" through "C", the Plaintiff, TERRY LYNN LIGON, was caused to suffer the following damages: Plaintiff's vehicle and camper were bent, battered, demolished, and rendered less valuable; the contents of Plaintiff's vehicle and camper were destroyed or lost.

WHEREFORE, premises considered, the Plaintiff, TERRY LYNN LIGON, claims compensatory and punitive damages for damages to both person and property and hereby demands judgment against all defendants both real and fictitious in an amount to be determined by the trier-of-fact, plus interest and costs.

Respectfully submitted,

/s/ Thomas W. Harmon
THOMAS W. HARMON (HAR088)
Attorney for Plaintiff

OF COUNSEL:
BROOKS, HARMON & JOHNSTON, LLC
Post Office Box 67
Anniston, Alabama 36202
Telephone: (256) 238-8356
Facsimile: (256) 238-8368
harmontom@bellsouth.net

PLAINTIFF DEMANDS TRIAL BY JURY.

/s/ Thomas W. Harmon
THOMAS W. HARMON (HAR088)
Attorney for Plaintiff

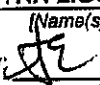

DOCUMENT 2

TO THE CLERK:

**Please serve the Defendants, Burrell Fitch Adriance and Henry and Henry, Inc., via
Certified Mail with a copy of the complaint at:**

**BURRELL FITCH ADRIANCE
1558 CROMER ROAD
ELBERTON, GA 30635**

**HENRY AND HENRY, INC.
207 STURGIS ROAD
MARION, KENTUCKY 42064**

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 49-CV-2021-900080.00
IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA TERRY LYNN LIGON V. BURRELL FITCH ADRIANCE ET AL		
NOTICE TO: HENRY AND HENRY, 207 STURGIS RD, MARION, KY 42064 <div style="text-align: right; font-size: small;">(Name and Address of Defendant)</div>		
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), THOMAS W HARMON <div style="text-align: right; font-size: small;">(Name(s) of Attorney(s))</div>		
WHOSE ADDRESS(ES) IS/ARE: P. O. BOX 67, ANNISTON, AL 36202 <div style="text-align: right; font-size: small;">(Address(es) of Plaintiff(s) or Attorney(s))</div>		
THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.		
TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:		
<input type="checkbox"/> You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.		
<input checked="" type="checkbox"/> Service by certified mail of this Summons is initiated upon the written request of <u>TERRY LYNN LIGON</u> <div style="text-align: right; font-size: small;">(Name(s))</div> pursuant to the Alabama Rules of the Civil Procedure.		
<u>10/07/2021</u> <div style="text-align: center; font-size: small;">(Date)</div>	<u>/s/ DENISE MIXON</u> <div style="text-align: center; font-size: small;">(Signature of Clerk)</div>	By: <u></u> <div style="text-align: right; font-size: small;">(Name)</div>
<input checked="" type="checkbox"/> Certified Mail is hereby requested. <u>/s/ THOMAS W HARMON</u> <div style="text-align: right; font-size: small;">(Plaintiff's/Attorney's Signature)</div>		
RETURN ON SERVICE		
<input type="checkbox"/> Return receipt of certified mail received in this office on _____ <div style="text-align: right; font-size: small;">(Date)</div>		
<input type="checkbox"/> I certify that I personally delivered a copy of this Summons and Complaint or other document to _____ <div style="text-align: right; font-size: small;">County,</div>		
<div style="display: flex; justify-content: space-between;"> _____ (Name of Person Served) _____ (Name of County) </div>		
Alabama on _____ <div style="text-align: center; font-size: small;">(Date)</div>		
_____ <div style="text-align: center; font-size: small;">(Type of Process Server)</div>	_____ <div style="text-align: center; font-size: small;">(Server's Signature)</div>	_____ <div style="text-align: center; font-size: small;">(Address of Server)</div>
_____ <div style="text-align: center; font-size: small;">(Server's Printed Name)</div>		_____ <div style="text-align: center; font-size: small;">(Phone Number of Server)</div>
49-CV-2021-900080.00 TERRY LYNN LIGON V. BURRELL FITCH ADRIANCE ET AL		
C001 - TERRY LYNN LIGON <div style="text-align: center; font-size: small;">(Plaintiff)</div>	v.	D002 - HENRY AND HENRY <div style="text-align: center; font-size: small;">(Defendant)</div>
		
SERVICE RETURN COPY		



AlaFile E-Notice

49-CV-2021-900080.00

To: JOHN W CLARK JR.
jclark@chslaw.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA

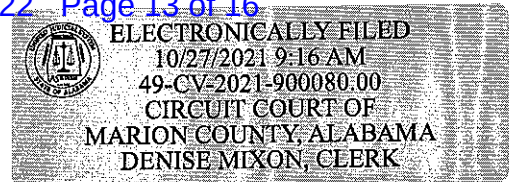
TERRY LYNN LIGON V. BURRELL FITCH ADRIANCE ET AL
49-CV-2021-900080.00

The following answer was FILED on 10/27/2021 9:16:14 AM

Notice Date: 10/27/2021 9:16:14 AM

DENISE MIXON
CIRCUIT COURT CLERK
MARION COUNTY, ALABAMA
132 SOUTH MILITARY STREET
HAMILTON, AL, 35570

205-921-7451
denise.mixon@alacourt.gov



IN THE CIRCUIT COURT OF MARION COUNTY, ALABAMA

TERRY LYNN LIGON,

Plaintiff,

v.

BURRELL FITCH ADRIANCE; and
HENRY AND HENRY, INC.,

Defendants.

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Case No.: CV2021-900080

ANSWER

Come now the Defendants, Burrell Fitch Adriance and Henry and Henry, Inc. and by way of answer to Plaintiff's Complaint say as follows:

1. Both Defendants deny they were guilty of any negligence that caused or contributed to cause the accident referred to in the Complaint.

2. Both Defendants deny they were guilty of any wanton misconduct which caused or contributed to cause the accident referred to in the Complaint.

3. Defendants reserve the right to file a motion to sever any claims for negligent entrustment from any of the other claims in the Complaint.

4. Defendant Henry and Henry, Inc. admit that Defendant Burrell Fitch Adriance was its agent and was acting within the line and scope of his employment at the time of the accident referred to in the Complaint.

5. In view of agency not being in dispute, any claim for negligent entrustment should be moot and dismissed.

6. Plaintiff was guilty of contributory negligence which contributed to the accident.

7. Plaintiff assumed the risk of an accident and injury by his conduct in stopping on the traveled portion of the road.

8. Defendant Henry and Henry, Inc. denies that Defendant Adriance was incompetent to operate a motor vehicle and/or denies it had any knowledge as to any incompetence of Defendant Adriance.

9. Defendant Henry and Henry, Inc. denies that it was guilty of any wanton entrustment of a motor vehicle.

10. Defendants deny the nature and extent of the injuries as alleged by the Plaintiff.

11. Plaintiff's expenses were paid for through a collateral source in an amount less than the amount as billed.

12. Defendants deny they were guilty of any conduct which would justify the imposition of punitive damages.

13. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of the constitutional safeguards provided to Defendants under the Constitution of the United States of America.

14. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of the constitutional safeguards provided to Defendants under the Due Process Clause of the Fourteenth Amendment to the Constitution of the United States in that punitive damages are vague and are not rationally related to legitimate government interests.

15. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of Article I, Section 6 of the Constitution of the State of Alabama which provides that no person shall be deprived of life, liberty, or property except by due process of law, in that punitive damages are vague and are not rationally related to legitimate government interests.

16. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of the procedural safeguards provided to Defendant under the Sixth Amendment to the Constitution of the United States in that punitive damages are penal in nature and, consequently, the Defendant is entitled to the same procedural safeguards accorded to criminal Defendant.

17. The Defendants aver that they are violative of the self-incrimination clause of the Fifth Amendment to the Constitution of the United States of America to impose punitive damages against it, which are penal in nature, yet compel it to disclose potentially incriminating documents and evidence.

18. The Defendants aver that they are violative of the rights guaranteed by the Constitution of the United States of America and the Constitution of the State of Alabama to impose punitive damages against these Defendants which are penal in nature by requiring a burden of proof on the Plaintiff which is less than the "beyond a reasonable doubt" burden of proof required in criminal cases.

19. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of the Eighth Amendment to the Constitution of the United States in that the damages would be an excessive fine in violation of the Excessive Fines Clause of the Eighth Amendment to the United States Constitution.

20. The Defendants aver that any award of punitive damages to the Plaintiff in this case will be violative of Article I, Section 15 of the Constitution of Alabama 1901 in that the damages would be an excessive fine.

21. Defendants reserve the right to amend this Answer and add additional defenses in the event discovery reveals such defenses to be available.

Date: October 27, 2021

s/Jay Clark

John W. Clark, Jr.

Clark, Hair & Smith, P.C.
1000 Urban Center Drive
Suite 125
Birmingham, Alabama 35242
205-397-2900
E: jclark@chslaw.com

Attorney for Defendants

DEFENDANT DEMANDS TRIAL BY JURY OF ALL ISSUES HEREIN.

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of October, 2021, I electronically filed the foregoing with the Clerk of the Court using the Alabama e-filing system which will send notification of such filing; and I hereby certify that any non e-filing participants to whom the foregoing is due will have a copy of same placed in the United States mail, first class postage prepaid and properly addressed this same day.

Thomas W. Harmon
Brooks, Harmon & Johnston, LLC
P.O. Box 67
Anniston, AL 36202
256-238-8356
E: harmontom@bellsouth.net

s/Jay Clark

Of Counsel